EXHIBIT C

MUNOZ DECLARATION

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

FTX TRADING LTD., et al., 1

Debtors.

Chapter 11

Case No: 22-11068 (JTD)

(Jointly Administered)

DECLARATION OF DIANA MUNOZ IN SUPPORT OF EDEN PROTOCOL LIMITED'S MOTION FOR ENTRY OF AN ORDER (I) GRANTING RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362(d)(1), (II) WAIVING BANKRUPTCY RULE 4001, AND (III) GRANTING RELATED RELIEF

I, Diana Munoz, declare, pursuant to 28 U.S.C. § 1746, under the penalty of perjury that:

- 1. I am a Director of Eden Protocol Limited ("Eden Protocol"). I am authorized by Eden Protocol to submit this Declaration in support of its *Motion for Entry of an Order* (I) Granting Relief from the Automatic Stay Under 11 U.S.C. § 362(d)(1), (II) Waiving Bankruptcy Rule 4001, and (III) Granting Related Relief (the "Motion"), filed contemporaneously herewith, seeking entry of an order granting, among other things, relief from the automatic stay for Eden Protocol to exercise its contractual right to terminate the TPA² entered into with Alameda Ventures Limited³ ("Alameda" or "Purchaser," and collectively with Eden Protocol, the "Parties").
 - 2. Except as indicated herein, all facts set forth in this Declaration are based upon my

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

² Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Motion.

The bankruptcy petition for debtor Maclaurin Investments Ltd. ("<u>Maclaurin</u>") states that it was formerly known as Alameda. Eden Protocol never received notice of a name change or transfer of assets from Alameda to Maclaurin.

personal knowledge, experience, and review of relevant documents. If called upon to testify, I would testify competently to the facts set forth herein.

- 3. I have read and reviewed the Motion and the TPA and am familiar with the information contained in those documents.
- 4. I am familiar with Eden Protocol's practices with respect to entering into commercial agreements, including those similar to the TPA. Additionally, I am familiar with the above-captioned bankruptcy proceedings and have personal knowledge of the relationship between Eden Protocol and Purchaser.
 - 5. In or around October 2021, the Parties entered into the TPA.
- 6. The TPA provides, in relevant part, for Eden Protocol to issue 16,666,667 future token rights (the "<u>Tokens</u>") to Purchaser in exchange for \$500,000.00 (the "<u>Purchase Price</u>").
 - 7. In late October 2021 the Purchase Price was funded.
 - 8. The Network Launch has not yet occurred.
- 9. As of the date hereof, Purchaser has not provided Eden Protocol with certain information and documentation required by the TPA, including providing Eden Protocol with an SPL-compliant network address and completing AML and KYC Forms.
- 10. If the Motion is not granted and Eden Protocol is not allowed to terminate the TPA, Eden Protocol will be subject to immense hardship. If Maclaurin, any Debtor entity, or any of their affiliates were permitted to obtain any of the Tokens, Eden Protocol's reputation and the success of the Network Launch would be negatively impacted as a result of any association with the Debtors and their conduct. I believe that this would result in the value of the Tokens being materially depressed, and that the value of other tokens and assets of Eden Protocol would be concomitantly impacted.

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Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: July 12, 2024 /s/ Diana Munoz

/s/ Diana Munoz DIANA MUNOZ

Director

Eden Protocol Limited